

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RECLAIM THE RECORDS and ALEC  
FERRETTI,

Plaintiffs,

- against -

UNITED STATES DEPARTMENT OF STATE,

Defendant.

**NOTICE OF CROSS MOTION**

**No. 23-CV-1471**

**PLEASE TAKE NOTICE** that upon the affirmation of David B. Rankin of Beldock Levine & Hoffman, LLP, sworn to on February 19, 2024 and the accompanying Memorandum of Law, the undersigned will request this Court located at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007 at a time of the Court's convenience for an:

1. Order to produce the documents requested through Freedom of Information Act ("FOIA"), 5 U.S.C. §§552 *et seq.*, following Judgement pursuant to Fed. R. Civ. P. 56; and
2. Other such relief as the Court finds just and proper.

[///]

Dated: February 19, 2024  
New York, New York

Respectfully submitted,

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New York, New York 10016  
*Attorneys for Plaintiff*



By: \_\_\_\_\_

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